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Attorneys for Plaintiff

Lowdown Distribution, Inc.

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH
CENTRAL DIVISION**

LL&L INNOVATIONS LLC, a Utah
limited liability company, and LOWDOWN
DISTRIBUTION, INC., a California
corporation,,

Plaintiffs,

v.

JERRY LEIGH OF CALIFORNIA, INC.,
a California corporation; KOHL'S
CORPORATION, a Wisconsin
corporation; JC PENNEY COMPANY,
INC., a Texas corporation; RUSTY
NORTH AMERICA, LLC, a California
limited liability company; HOT TOPIC
MERCHANDISING, INC, a California
corporation, and SUN COAST
MERCHANDISE CORPORATION d/b/a
SUNSCOPE, a California corporation,

Defendants.

Civil Action No. 2:10-cv-00829-TC

**MEMORANDUM IN SUPPORT
OF MOTION FOR ENTRY
PROTECTIVE ORDER**

Honorable Chief Judge Tena Campbell

Plaintiffs LL&L Innovations LLC and Lowdown Distribution, Inc. (collectively, "Plaintiffs"), by and through their counsel of record and pursuant to FED. R. CIV. P. 7(b)(1) and DUCivR 7-1(b), hereby file this Memorandum in Support of Motion for Entry of Judge Campbell's Standard Protective Order Governing Patent Actions.

I. PLAINTIFFS' REQUEST THAT THE COURT'S STANDARD PROTECTIVE ORDER FOR PATENT CASES BE ENTERED.

This is a patent infringement action. As a result, the Court's standard protective order governing patent cases should be utilized. A protective order in this matter is necessary as confidential and propriety trade secrets and other information will be produced and/or otherwise disclosed by the parties and by non-parties during the course of the litigation.

On or about February 28, 2011, counsel for Plaintiffs and Defendants telephonically discussed the Court's standard patent Protective Order. Plaintiffs believe that the Court's standard patent Protective Order is sufficient for this matter. Defendants, however, requested that the Court's standard patent Protective Order be modified in the form attached hereto as Exhibit B. Because Plaintiffs believe that the Court's standard patent Protective Order is sufficient, and that Defendants' suggested modifications are unnecessary, Plaintiffs did not agree to Defendants' proposed modifications.

Based upon the foregoing, Plaintiffs respectfully request that the Court enter Plaintiffs' proposed Protective Order in the form attached hereto as Exhibit A.

DATED this 2nd day of March, 2011.

KIRTON & McCONKIE

WORKMAN NYDEGGER

s/ James B. Belshe
James B. Belshe

s/ Chad E. Nydegger
Chad E. Nydegger

James T. Burton
Shawn T. Richards
Attorneys for Plaintiff
Lowdown Distribution, Inc.

Attorneys for Plaintiff
LL&L Innovations, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this the 2nd day of March, 2011, a copy of the foregoing was filed electronically through the Court's CM/ECF system, which caused service upon all counsel registered thereon.

/s/ Heather Bartlett
Heather Bartlett

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